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OFFICE OF THE  
EXECUTIVE SECRETARY

March 6, 1998

David Waddell  
Executive Director  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

In Re: *BellSouth Telecommunications, Inc.'s Entry into  
Long Distance (interLATA) Service in Tennessee  
Pursuant to Section 271 of the Telecommunications  
Act of 1996*

*Docket No: 97-00309*

Dear Mr. Waddell:

Please find enclosed the original and thirteen copies of  
AT&T's Second Set of Data Requests to BellSouth  
Telecommunications, Inc.

Sincerely,

  
Jim Lamoureux

cc: Parties of record

BEFORE THE  
TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee

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REGULATORY AUTH.

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OFFICE OF THE  
EXECUTIVE SECRETARY

In Re: BellSouth Telecommunications,     )  
Inc.'s Entry into Long Distance         )  
(interLATA) Service in Tennessee         ) Docket No. 97-00309  
Pursuant to Section 271 of the            )  
Telecommunications Act of 1996            )

**AT&T'S SECOND SET OF DATA REQUESTS  
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

AT&T Communications of the South Central States, Inc. ("AT&T") hereby serves its Second Set of Data Requests to BellSouth Telecommunications, Inc. ("BellSouth"), to be answered in writing under oath.

**DEFINITIONS AND INSTRUCTIONS**

AT&T incorporates by reference the Definitions and Instructions that were set forth in AT&T's First Set of Data Requests To BellSouth Telecommunications, Inc., served February 10, 1998.

**DATA REQUESTS**

1. Describe the monthly retail flow-through rate for:
  - (a) BellSouth's residence orders;
  - (b) BellSouth's business orders;
  - (c) BellSouth's residence and business orders combined.
2. Identify in detail the basis for BellSouth's statement, in its response to Item No. 3 of the Data Requests of the Consumer Advocate Division ("CAD"), that the adjusted flow-through rate for CLECs for January 1998 is "comparable to the combined retail flow-through rates for residence and business orders." Your answer should include, but is not limited to, a description (in percentages) of the specific "combined retail flow-through rates" to which BellSouth refers.

3. With respect to the monthly flow-through reports that BellSouth provided in response to the data requests of AT&T and the CAD (see, e.g., BellSouth Electronic Interface Flow-Through Report for period 1/01/98 to 1/30/98):
  - (a) Identify the particular errors that BellSouth regarded as "CLEC errors" or "CLEC SOER errors" for purposes of the reports;
  - (b) Identify the particular errors that BellSouth regarded as BellSouth errors ("BST errors") for purposes of the reports;
  - (c) Describe the criteria, guidelines, or methodology that BellSouth used to determine whether a particular error that prevented an order from flowing through was a CLEC error, as opposed to a BST error (or vice versa).
4. With respect to the BellSouth Electronic Interface Flow-Through Report for the reporting period January 1, 1998 - January 31, 1998:
  - (a) Identify the CLECs listed as companies "L" and "P" (which are described as having non-adjusted flow-through rates of 98.0% and 96.1%, respectively);
  - (b) Describe the types of orders submitted by CLEC "L" during the month of January (such as migration as is), and the number of orders within each type;
  - (c) Describe the types of orders submitted by CLEC "P" during the month of January (such as migration as is), and the number of orders within each type.
5. With respect to the volume tests that BellSouth performed on its Local Exchange Ordering and Pre-Ordering Gateway system on January 15, 1998:
  - (a) Describe in detail any file space problems on the BellCore simulator server that occurred during the tests, including but not limited to a description of the nature of the problems, the time when the problems first began to occur, and the time when the problems ended;
  - (b) Describe any other problems that occurred during the tests.

6. Identify the additional costs that, by BellSouth's calculation or estimate, BellSouth would be required to incur if it was required to add the capability in its central offices to capture usage data for flat rate calls. Your response should include, but is not limited to, a description of the basis for the calculation or estimate provided.
7. Does BellSouth make systems such as CommTech's MACSTAR or BellCore's CCRS available to its CENTREX (or equivalent service) customers?
8. If the answer to question 7 is "yes," do these systems give BellSouth's CENTREX (or equivalent service) customers capability to perform recent changes that affect the CENTREX (or equivalent service) customers' lines?
9. If the answer to question 8 is "no," explain how a CENTREX (or equivalent service) customer can (a) add a line, (b) add a feature, or (c) suspend service on a line.
10. Can a CENTREX (or equivalent service) customer affect a recent change for lines other than those dedicated to its use? If so, how?
11. In the majority of cases in which a residential POTS customer with analog service discontinues service because he or she has moved, does BellSouth physically remove any facilities (e.g., cross-connections) in order to disconnect the service? If so, is the physical work done solely to accomplish disconnection, or is it performed to accomplish some other task?
12. In an average large central office in a large metropolitan area in BellSouth's region, approximately how many PIC changes are performed in a given day?
13. Under BellSouth's proposal to recombine the loop and switch through collocation, what if any pre-wiring by CLECs will BellSouth permit at (1) the main distribution frame ("MDF"); (2) the intermediate distribution frame ("IDF"); and (3) in the CLEC's collocated space?
14. Where CLECs request collocated space solely for the purpose of loop/switch recombination, will BellSouth require use of an IDF?

15. What is the longest service outage a customer has experienced during conversion of a BellSouth customer to a UNE CLEC customer during the last six months?
16. What is the "incremental charge" that a CLEC ordering a Service Level One loop must pay to obtain a coordinated cutover of service, as described in BellSouth's Unbundled Loop Interdepartmental Service Description, p. 9 (attachment WKM-9 to Milner Aff. in FCC CC Docket No. 97-231)?
17. What are the total charges that a CLEC must pay when ordering a Service Level One loop such that the loop would not be out of service for more than 5 minutes.
18. Which components of BellSouth's network in Tennessee have been combined from remote locations using the cross-connect systems described in response to Item No. 34 of AT&T's First Data Request?
19. Does BellSouth plan to undertake or commission any testing or studies concerning expected or actual durations of service outages for conversion of existing BellSouth customer to UNE-combination CLEC customers? If so, how and when will the testing or studies be conducted?
20. Does BellSouth plan to undertake or commission any testing or studies concerning the number of loop/switch combination orders that BellSouth could provision in a single central office per day? If so, how and when will the testing or studies be conducted?
21. What is (a) the longest interval to which BellSouth has committed for the provision of collocated space; and (b) what is the shortest interval to which BellSouth has committed for the provision of collocated space?
22. Does BellSouth plan to undertake or commission any testing or studies to determine whether it can meet its committed intervals for provision of collocated space? If so, how and when will the testing or studies be conducted?
23. May CLECs purchase at a UNE price interoffice transport shared with BellSouth?
24. Will BellSouth require CLECs to recombine signaling and switching? If so, describe BellSouth's proposal.

25. Will BellSouth require CLECs to recombine switching and interoffice transport? If so, describe BellSouth's proposal.
26. Will BellSouth require CLECs to recombine signaling and databases? If so, describe BellSouth's proposal.
27. Will BellSouth require CLECs to recombine switching and databases? If so, describe BellSouth's proposal.
28. Will BellSouth require CLECs to recombine switching and OSS? If so, describe BellSouth's proposal.
29. Will BellSouth require CLECs to recombine switching and OS/DA? If so, describe BellSouth's proposal.
30. Has BellSouth revised its methods and procedures for provisioning unbundled network elements, collocated space or local number portability as the result of discussions with or issues raised by NextLink? If the answer is affirmative, please specify such discussions and provide any supporting documentation.
31. Is BellSouth currently providing such data as described in Document Requests 11 and 12 of AT&T's Second Set of Data Requests to any CLEC, either in the context of testing or in the context of live traffic? If not, why not?
32. Has BellSouth revised its methods and procedures for provisioning unbundled network elements and collocated space as a result of discussions with, or issues raised by, NextLink referenced in the October 28, 1997 letter from Charles Howorth of BellSouth to Don Hillenmeyer of NextLink produced by BellSouth in response to AT&T Document Request No. 31 in AT&T's First Set of Data Requests?

#### **DOCUMENT REQUESTS**

1. Produce all work papers and other documents provided to, created by, relied upon, or otherwise used by, Ernst & Young, LLP in preparing its Report of Independent Accountants on the Statement of BellSouth Operating Support Systems Performance and Operational Readiness as of February 11, 1998, which was issued on or about February 11, 1998 ("February 11 Ernst & Young Report").


2. With respect to the February 11 Ernst & Young Report, produce copies of:
  - (a) all documents which contain or set forth the scope of the review of BellSouth's OSS by Ernst & Young;
  - (b) all correspondence and any agreements constituting, evidencing or reflecting the retention of Ernst & Young by BellSouth, and the terms of that retention;
  - (c) all documents constituting, evidencing, or reflecting the work plans of Ernst & Young for its review and report;
  - (d) all documents, information, and materials (whether paper, electronic, or any other form) that Ernst & Young have reviewed, considered, or relied upon in connection with its review of BellSouth's OSS;
  - (e) all work product (whether paper, electronic, or any other form) prepared by Ernst & Young in connection with its review of BellSouth's OSS, including any and all analyses, memoranda, notes, interview notes, indices, summaries, logs, and all other types of work product, and including, but not limited to, drafts or any preliminary reports in any form;
  - (f) all documents that relate to any problems or deficiencies in BellSouth's OSS that were identified by Ernst & Young in connection with the preparation of the February 11 Report, including but not limited to documents that reflect (1) any views or recommendations of Ernst & Young, and (2) any responses or actions taken by BellSouth in response to such views or recommendations;
  - (g) to the extent not specifically requested in sub-parts (a) through (f) herein, all documents underlying the February 11 report.
3. Produce all documents that discuss, describe, refer to, or relate to:
  - (a) the volume tests that BellSouth performed on January 15, 1998, of the Local Exchange Ordering and Pre-ordering gateway system;

- (b) any space problem on the BellCore simulator server that occurred in the course of these volume tests.
- 4. Produce all documents that discuss, describe, refer to, or relate to, any tests (other than the volume tests described in Document Request No. 3) on BellSouth's OSS that were performed or observed by Ernst & Young in connection with the preparation of the February 11 Ernst & Young Report.
- 5. Produce all documents that describe or discuss (or from which one can determine), for BellSouth's retail operations:
  - (a) the monthly retail flow-through rate for residence orders;
  - (b) the monthly retail flow-through rate for business orders;
  - (c) the combined retail flow-through rate for residence and business orders.
- 6. Produce any and all documents that formed the basis for BellSouth's statement, in its response to Item No. 3 of the Data Requests of the CAD, that the adjusted January 1998 flow-through rate for CLECs is "comparable to the combined retail flow-through rates for residence and business orders."
- 7. With respect to the flow-through reports and BellSouth analysis of order flow-through and errors (which BellSouth provided in response to Item No. 1 of AT&T's requests for production of documents and to Item No. 3 of the Data Requests of the CAD):
  - (a) Produce all documents and databases that were used, considered, or relied upon to prepare the flow-through reports, and all documents that discuss or describe such reports;
  - (b) Produce all documents and databases that were used, considered, or relied upon to prepare the BellSouth analysis of order flow-through and errors, and all documents that discuss or describe the analysis;
  - (c) Produce all documents that explain the criteria, guidelines, or methodology used by BellSouth to determine whether an error that prevented an order from



- flowing through was a "CLEC error", as opposed to a "BST error" (or vice versa);
- (d) Produce all other underlying documents for the flow-through reports and the underlying analysis;
  - (e) Produce all documents that constitute, discuss, or reflect any SOER error analysis conducted by BellSouth.
8. With respect to BellSouth's monthly flow-through report for January 1998, produce all documents that discuss or describe the flow-through rates for the CLECs described in the report as CLECs "L" and "P," and the types of orders submitted during the month of January 1998 by CLECs "L" and "P."
  9. Produce all documents that state or estimate the cost that BellSouth would incur if it were required to add the capability, in its central offices, to capture usage data for flat rate calls.
  10. Please provide any revised BellSouth methods and procedures for provisioning unbundled network elements, collocated space or local number portability.
  11. Please produce data files or other evidence that demonstrates BellSouth's ability to electronically provide billing to CLECs for the purchase of unbundled network elements.
  12. Please produce data files or other evidence that demonstrates BellSouth's ability to electronically generate billing information for CLECs that would allow CLECs to bill IXCs for originating and terminating access traffic.
  13. If the answer to Data Request No. 32 is affirmative, please provide any supporting documentation regarding revised methods and procedures.
  14. Produce copies of BellSouth responses to data requests and document requests served on BellSouth in Docket No. 97-00309 by parties other than AT&T.

Respectfully submitted, this 6th day of March, 1998.

  
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Attorney for AT&T  
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**CERTIFICATE OF SERVICE**

I, James P. Lamoureux, hereby certify that on this 6th day of March, 1998, a true and correct copy of the foregoing has been delivered via U. S. Mail, postage prepaid to the following counsel of record:

  
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